

1 THE HONORABLE JAMAL N. WHITEHEAD
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 PLAINTIFF PACITO; PLAINTIFF ESTHER;
10 PLAINTIFF JOSEPHINE; PLAINTIFF SARA;
11 PLAINTIFF ALYAS; PLAINTIFF MARCOS;
12 PLAINTIFF AHMED; PLAINTIFF RACHEL;
13 PLAINTIFF ALI; HIAS, INC.; CHURCH
WORLD SERVICE, INC.; and LUTHERAN
COMMUNITY SERVICES NORTHWEST,

Plaintiffs,

14 v.
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16 DONALD J. TRUMP, in his official capacity as
17 President of the United States; MARCO RUBIO,
in his official capacity as Secretary of State;
18 KRISTI NOEM, in her official capacity as
Secretary of Homeland Security; ROBERT F.
19 KENNEDY, JR., in his official capacity as
Secretary of Health and Human Services,

Defendants.

Case No. 2:25-cv-255-JNW

**DECLARATION OF MELISSA
KEANEY IN SUPPORT OF
PLAINTIFFS' REPLY IN
SUPPORT OF MOTION FOR
PRELIMINARY INJUNCTION ON
SUPPLEMENTAL PLEADING**

21 I, Melissa Keaney, hereby declare as follows:
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23 1. I am over the age of eighteen and competent to make this declaration. I am an
attorney with the International Refugee Assistance Project and counsel for Plaintiffs in the above-
24 captioned matter. I make this declaration based on personal knowledge about which I am
25 competent to testify.
26

DECL. OF MELISSA KEANEY
(No. 2:25-cv-255-JNW)

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2. I submit this declaration to provide the Court true and correct copies of certain documents submitted in support of Plaintiffs' reply in support of their motion for a preliminary injunction on supplemental pleading:

Exhibit 1 is a true and correct copy of the declaration of Emily Russ (with Attachment A), dated March 11, 2025.

Exhibit 2 is a true and correct copy of the declaration of Plaintiff Ali, dated March 11, 2025.

Exhibit 3 is a true and correct copy of the declaration of Jenifer Smyers, dated March 11, 2025.

* * *

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

EXECUTED this 11th day of March, 2025, at Sacramento, California.

s/ Melissa Keaney
Melissa Keaney